

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2004 APR 30 P 12:10

STEVEN DRURY,

Plaintiff,

V.

THE NEW ENGLAND REGIONAL COUNCIL OF
CARPENTERS, CARPENTERS LOCAL UNION NO.
107, THOMAS HARRINGTON, ART SISCO, SIMON
JAMES, and KENNEDY & ROSSI, INC.,

Defendants.

)
U.S. DISTRICT COURT
DISTRICT OF MASS.

) C.A. NO. 03-11422-MLW

**UNION DEFENDANTS' RESPONSE TO
PLAINTIFF'S EMERGENCY MOTION FOR A PRELIMINARY INJUNCTION**

The Union defendants respectfully submit this response to plaintiff's emergency motion for a preliminary injunction.

ARGUMENT

In this action, plaintiff asserts, contrary to federal law and regulations, that federal employment forms IRS W-4 and INS I-9 are voluntary, that employees are not required to provide their social security numbers to their employers, and that the Union engaged in some form of misconduct by refusing to refer plaintiff to employment opportunities because of his persistent refusal to sign the federally mandated forms or provide the federally mandated employment information.

These issues, which plaintiff has now attempted to raise in his emergency motion, have been fully briefed in the context of both a motion to remand filed by plaintiff and a motion to dismiss filed by the Union defendants. Defendants respectfully request that the Court first address the issues in those two motions, and proceed to plaintiff's motion for an injunction in the

event it does not dispose of the case on either of the two pending motions. In the event further proceedings are required after ruling on those two motions, defendants respectfully request that the Court schedule a status conference at which time the efficient processing of this action, including proceeding on plaintiff's motion for an injunction and his many other pending motions, may be addressed.

In the meantime, the Union defendants respectfully request that the Court grant their pending motion to defer plaintiff's various pending motions and any new motions he may file in the future until the Court rules on the pending dispositive motions.

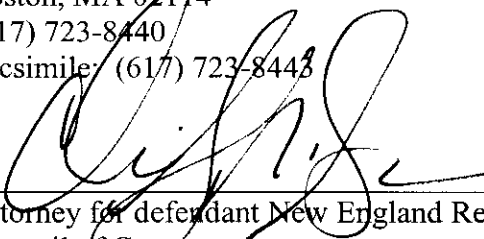
CONCLUSION

For the foregoing reasons, the Union defendants respectfully request that all pending and new motions in this case be deferred until the Court rules on the two pending dispositive motions, at which time a status conference can be held, if necessary, to determine how best to proceed with the rest of the case.

Date: April 29, 2004

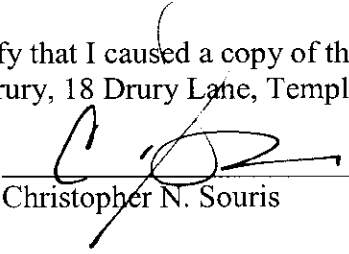
Respectfully submitted,

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Attorney for defendant New England Regional
Council of Carpenters

CERTIFICATE OF SERVICE

I, Christopher N. Souris, hereby certify that I caused a copy of the foregoing to be sent this 12th day of August, 2003 to Steven R. Drury, 18 Drury Lane, Templeton, MA 01468 and Liam T. O'Connell,



Christopher N. Souris